

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,

Defendants.

Civil Action No. 5:21-cv-844 (XR)  
(consolidated cases)

**UNITED STATES’ OBJECTIONS AND COUNTER-DESIGNATIONS TO STATE  
DEFENDANTS’ AND INTERVENOR-DEFENDANTS’ DEPOSITION DESIGNATIONS**

<b>Witness</b>	<b>Designation</b>	<b>Objection(s)</b>	<b>Counter-Designation(s)</b>
Hollins, Chris	129:25-130:9	Leading; Relevance	
Hollins, Chris	178:1-4	Incomplete designation; Vague; Relevance	175:14-22, 175:24- 176:15, 178:7-179:2
Ramón, Yvonne Apr. 21, 2022	41:22-43:2	Leading; Vague as to “involved”	
Ramón, Yvonne Apr. 21, 2022	68:20-69:18	Lack of personal knowledge; Calls for speculation; Relevance  See 68:13-19: Ms. Ramón testifies she does not know legislators’ reasons for passing SB1	68:13-19
Ramón, Yvonne Apr. 21, 2022	74:4-16	Hearsay; Vague	74:17-75:7
Ramón, Yvonne Apr. 21, 2022	75:12-24	Leading (as to 75:12- 21); Vague and ambiguous as to “we”	75:25-76:2

<b>Witness</b>	<b>Designation</b>	<b>Objection(s)</b>	<b>Counter-Designation(s)</b>
Ramón, Yvonne Apr. 21, 2022	88:18-22	Lack of foundation; Calls for speculation; Relevance  See 68:13-19: Ms. Ramón testifies she does not know legislators' reasons for passing SB1	68:13-19
Ramón, Yvonne Apr. 21, 2022	88:23-24	No witness testimony designated in response to designated question; Lack of foundation; Calls for speculation; Relevance	68:13-19
Ramón, Yvonne Apr. 21, 2022	89:15-22	Lack of foundation; Assumes facts not in evidence (no indication of what "this paragraph" refers to); Calls for speculation; Relevance	68:13-19
Ramón, Yvonne Apr. 21, 2022	93:12-16	Lack of foundation; Assumes facts not in evidence (no testimony designated regarding "those budget issues"); Relevance	
Ramón, Yvonne Apr. 21, 2022	93:17-94:7	Relevance	
Ramón, Yvonne Apr. 21, 2022	94:8-94:12	Incomplete response designated; Relevance	
Ramón, Yvonne Apr. 21, 2022	111:21-25	Vague and ambiguous as to what "application" means; assumes facts not in evidence regarding "online application"; Relevance	

<b>Witness</b>	<b>Designation</b>	<b>Objection(s)</b>	<b>Counter-Designation(s)</b>
Ramón, Yvonne Apr. 21, 2022	112:10-113:5	Vague and ambiguous as to what “application” means; Relevance	
Ramón, Yvonne Apr. 21, 2022	137:12-138:14		138:23-139:12
Ramón, Yvonne Apr. 21, 2022	143:16-145:1		142:23-143:15; 145:2-15
Ramón, Yvonne Apr. 21, 2022	146:11-147:2		147:3-11
Ramón, Yvonne Apr. 21, 2022	152:1-9	Mischaracterizes testimony; Lack of foundation; Lack of personal knowledge	169:1-25
Ramón, Yvonne Apr. 21, 2022	153:8-12	Vague and ambiguous as to “marry up”	
Ramón, Yvonne Apr. 21, 2022	153:17-154:5	Calls for undisclosed expert opinion; Lack of foundation; Lack of personal knowledge; Vague and ambiguous as to “best”	
Ramón, Yvonne Apr. 21, 2022	154:10-15	Lack of foundation; Lack of personal knowledge	
Ramón, Yvonne Apr. 21, 2022	155:2-29	Calls for undisclosed expert opinion; Lack of foundation; Lack of personal knowledge; Vague and ambiguous as to “more effective” and “superior”	155:21-157:3; 158:2-15
Ramón, Yvonne Apr. 21, 2022	167:3-8	Calls for speculation; Vague and ambiguous as to “Pre-Senate Bill 1 process”	
Ramón, Yvonne Apr. 21, 2022	171:24-172:17		170:5-171:17

<b>Witness</b>	<b>Designation</b>	<b>Objection(s)</b>	<b>Counter-Designation(s)</b>
Ramón, Yvonne Apr. 21, 2022	173:10-12	Vague and ambiguous as to “that”	
Ramón, Yvonne Apr. 21, 2022	173:24-25	Relevance; Partial question with no response designated	
Ramón, Yvonne Apr. 21, 2022	207:22-208:2	Compound	
Ramón, Yvonne May 10, 2022	151:16-153:22		149:20-151:15
Ramón, Yvonne May 10, 2022	157:5-15		157:16-22
Ramón, Yvonne May 10, 2022	158:3-11	Calls for speculation; Lack of personal knowledge; Nonresponsive	
Ramón, Yvonne May 10, 2022	230:7-231:9		231:11-235:3
Longoria, Isabel Apr. 20, 2022	29:14-20	Vague and ambiguous as to “the cure process you referred to earlier”	
Longoria, Isabel Apr. 20, 2022	30:4-7	Vague, ambiguous, and lacks foundation as to “previous testimony” referred to in the question	
Longoria, Isabel Apr. 20, 2022	100:20-101:8	Relevance	
Longoria, Isabel Apr. 20, 2022	104:3-14, 104:23-105:5, 106:7-19, 107:9-108:18	Relevance	
Longoria, Isabel Apr. 20, 2022	111:3-112:3, 114:22-115:12, 115:15-116:13, 116:16-22, 119:2-121:7	Relevance	
Longoria, Isabel Apr. 20, 2022	121:17-122:7	Relevance; Hearsay	

<b>Witness</b>	<b>Designation</b>	<b>Objection(s)</b>	<b>Counter-Designation(s)</b>
Longoria, Isabel Apr. 20, 2022	122:17-25	Relevance	
Longoria, Isabel Apr. 20, 2022	123:10	No question designated; Incomplete answer	
Longoria, Isabel Apr. 20, 2022	123:16-18	Relevance; Vague and ambiguous generally; Vague and ambiguous as to “another case”	
Longoria, Isabel Apr. 20, 2022	123:23-124:14	Relevance; Lack of foundation; Assumes facts not in evidence; Vague and ambiguous as to “those groups”	
Longoria, Isabel Apr. 20, 2022	125:3-5	No testimony designated; Question calls for speculation; Lack of foundation	
Longoria, Isabel Apr. 20, 2022	125:10-25	Relevance; Calls for speculation; Lack of personal knowledge	
Longoria, Isabel Apr. 20, 2022	134:4-14		134:15-135:8
Longoria, Isabel Apr. 20, 2022	141:21-142:5		141:8-20, 142:6-8
Longoria, Isabel Apr. 20, 2022	144:3-9	Argumentative; Calls for speculation; Lack of foundation; Improper hypothetical	
Longoria, Isabel Apr. 20, 2022	145:1-3	Argumentative; Leading	
Longoria, Isabel Apr. 20, 2022	145:4-7	Leading	
Longoria, Isabel Apr. 20, 2022	145:14-20	Calls for a legal conclusion	

<b>Witness</b>	<b>Designation</b>	<b>Objection(s)</b>	<b>Counter-Designation(s)</b>
Longoria, Isabel Apr. 20, 2022	145:21-146:2	Argumentative; Leading	
Longoria, Isabel Apr. 20, 2022	147:3-5	Relevance	147:6-13, 147:20-148:1
Longoria, Isabel Apr. 20, 2022	148:16-25	Relevance	
Longoria, Isabel Apr. 20, 2022	149:1-16	Relevance	
Longoria, Isabel Apr. 20, 2022	155:7-13		155:14-155:24
Longoria, Isabel Apr. 20, 2022	158:24-160:2		157:17-158:23
Longoria, Isabel Apr. 22, 2022	73:1-9	No page 73 on transcript	
Longoria, Isabel Apr. 22, 2022	77:24-25	No testimony designated	
Longoria, Isabel Apr. 22, 2022	77:15-21	Partial questions designated	
Longoria, Isabel Apr. 22, 2022	79:17	Partial question, no testimony designated	
Longoria, Isabel Apr. 22, 2022	82:25-83:19	Vague and ambiguous as to “that distinction”; Lack of foundation	
Longoria, Isabel Apr. 22, 2022	87:16-88:23	Exhibit 15 contains hearsay; Relevance	
Longoria, Isabel Apr. 22, 2022	98:15	No testimony designated	

<b>Witness</b>	<b>Designation</b>	<b>Objection(s)</b>	<b>Counter-Designation(s)</b>
Longoria, Isabel Apr. 22, 2022	100:22-101:13	Mischaracterizes testimony (attributes counsel's statement to witness); Lack of foundation; Lack of personal knowledge (see 101:8-9)	
Longoria, Isabel Apr. 22, 2022	103:18-104:3	Leading; Argumentative; Vague and ambiguous as to "or something"; Compound ("election fraud or identity theft")	
Longoria, Isabel Apr. 22, 2022	105:11-16	Leading	
Longoria, Isabel Apr. 22, 2022	107:2-22		107:23-108:22
Longoria, Isabel Apr. 22, 2022	108:23-109:8		109:9-111:1
Longoria, Isabel Apr. 22, 2022	118:7	No testimony designated	
Longoria, Isabel Apr. 22, 2022	118:13-25	Lack of foundation; Vague and ambiguous	
Vera, Alan	92:14-93:10		121:2-21